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April 7, 2022

**VIA ECF ONLY**

Hon. Robert W. Lehrburger, U.S.M.J.  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1960  
New York, New York 10007-1312

**Re: In re Customs and Tax Administration of the Kingdom of  
Denmark (SKAT) Tax Refund Litigation  
Master Docket No.: 1:18-md-02865-LAK-RWL<sup>1</sup>**

Dear Judge Lehrburger:

This office represents Mitchell Protass, Thomas Kertelits and Svetlin Petrov Petkov and their associated pension plans in eight (8) relevant actions consolidated within the above-referenced multi-district litigation (“MDL”). We write to Your Honor jointly with counsel for Plaintiff Skatteforvaltningen (“SKAT”) in response to the Court’s Text Order of March 30, 2022. *See* ECF No. 767. After conferring with our clients and SKAT’s counsel, we agree it would be most productive to have a single, joint settlement conference involving all three (3) individual defendants’ cases as opposed to three (3) separate settlement conferences.

We await further instruction from the Court on how best to coordinate with Your Honor’s Deputy Clerk and SKAT’s counsel to schedule a pre-conference call and the settlement conference.

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<sup>1</sup> This letter relates to the following eight (8) Civil Action Nos. within this MDL: 1:18-cv-04890-LAK-RWL, 1:18-cv-04892-LAK-RWL, 1:18-cv-04896-LAK-RWL, 1:18-cv-05299-LAK-RWL, 1:18-cv-05300-LAK-RWL, 1:18-cv-05305-LAK-RWL, 1:18-cv-05308-LAK-RWL, and 1:18-cv-05309-LAK-RWL.

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We thank Your Honor for your consideration of this submission. We will make ourselves available if the Court requests further information.

Respectfully submitted,

*s/ Joseph LoPiccolo*

JOSEPH LoPICCOLO

JLP/asa

c. All counsel of record (Via ECF Only)